

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

RYANAIR DAC,

Plaintiff,

v.

BOOKING HOLDINGS INC.,  
BOOKING.COM B.V., KAYAK SOFTWARE  
CORPORATION, PRICELINE.COM LLC,  
and AGODA COMPANY PTE. LTD,

Defendants.

C.A. No. 20-01191-WCB

**PUBLIC VERSION**

**DECLARATION OF GLENNON PAREDES IN SUPPORT OF  
DEFENDANTS' MOTION FOR SUMMARY JUDGMENT**

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Dated: December 20, 2023

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I, Glennon Paredes, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over eighteen (18) years of age, of sound mind, and otherwise competent to make this Declaration. I am Vice President of Business Integration at Booking Holdings Inc. ("BHI"). I have served in this role since September 2018. As a result, I have personal knowledge of the statements set forth in this declaration or I have learned the information provided herein from BHI data sources and knowledgeable BHI employees as part of my role as Vice President of Business Integration. I sat for a deposition in the above-captioned matter on September 21, 2023. If called as a witness, I could and would testify competently to the matters set forth herein.

2. BHI is a holding company of global travel companies. It wholly owns subsidiaries Booking.com B.V., Kayak Software Corporation, Priceline.com LLC, Agoda Company Pte. Ltd., as well as other entities.

3. BHI does not operate a consumer-facing website. It does not display flights or sell or facilitate any flight bookings for consumers.

4. BHI does not access the Ryanair website to obtain fares and schedules or to book flights. BHI does not work with any of its subsidiaries or any third party to obtain Ryanair fares and schedules or book Ryanair flights.

5. BHI is not involved in the daily flight operations of its subsidiaries, or in the relationships between its subsidiaries and any vendors that provide flight content and perform bookings for its subsidiaries.

6. BHI does not have agreements with third party vendors regarding flight content or the booking of flights. To the extent any Defendant BHI subsidiary offers flights to consumers on their platform at all, that subsidiary enters into its own agreement(s) to obtain flight content, and that relationship is not managed by BHI. BHI is not a party to any agreements that its subsidiaries have with third parties that provide flight content.

7. BHI does not direct or manage its subsidiaries' decisions to partner with specific online travel agents, airlines, or technology partners. BHI does not direct its subsidiaries or its subsidiaries' vendors or partners to procure flights from any particular airline, in any particular manner, or to procure flight content at all.

8. In November 2021, BHI entered into an agreement to acquire Etraveli Group AB ("Etraveli"), but the acquisition did not take place. In August 2023, the EU Commission announced that it would block the planned acquisition. In the approximately two year period prior to August 2023, BHI engaged in standard diligence related to Etraveli in connection with the planned acquisition.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on December 18, 2023.

Glennon Paredes  
Glennon Paredes

**CERTIFICATE OF SERVICE**

I hereby certify that on December 20, 2023, a true and correct copy of the foregoing document was caused to be served on the following counsel of record in the manner indicated.

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/s/ Jeffrey L. Moyer

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